

**U.S. District Court**  
**District of Maryland (Baltimore)**  
**CIVIL DOCKET FOR CASE #: 1:18-cv-02238-GJH**

Naffis v. United States Department of Education  
Assigned to: Judge George Jarrod Hazel  
Cause: 05:552 Freedom of Information Act

Date Filed: 07/23/2018  
Jury Demand: None  
Nature of Suit: 895 Freedom of  
Information Act  
Jurisdiction: U.S. Government Defendant

**Plaintiff**

**Parviz N Naffis**

represented by **Kim D Parker, Esq.**  
The Law Offices of Kim Parker, P.A.  
2123 Maryland Avenue  
Baltimore, MD 21218  
410-234-2621  
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**ATTORNEY TO BE NOTICED**

V.

**Defendant**

**United States Department of Education**

represented by **Sarah A Marquardt**  
United States Attorney's Office  
36 S. Charles Street  
Baltimore, MD 21201  
14102094801  
Fax: 11409622310  
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**LEAD ATTORNEY**  
**ATTORNEY TO BE NOTICED**

| Date Filed | #        | Docket Text   |
|------------|----------|---|
| 07/23/2018 | <u>1</u> | COMPLAINT FOR INJUNCTIVE RELIEF AND COST against United States Department of Education, filed by Parviz N Naffis.(Parker, Kim) (Entered: 07/23/2018)  |
| 07/23/2018 | <u>2</u> | -SEALED-Emergency MOTION for Leave to Proceed in forma pauperis by Parviz N Naffis(Parker, Kim) (Entered: 07/23/2018)   |
| 07/23/2018 | <u>3</u> | Supplemental to <u>1</u> Complaint, <u>2</u> Emergency MOTION for Leave to Proceed in forma pauperis filed by Parviz N Naffis ( <i>Summons Requested</i> ) (Attachments: # <u>1</u> Summons Pursuant to 34 C.F.R. § 4.1, # <u>2</u> Summons Pursuant to 34 C.F.R. § 4.1)(Parker, Kim) (Entered: 07/23/2018)   |
| 07/23/2018 | <u>4</u> | Supplemental to <u>1</u> Complaint, <u>3</u> Supplemental, <u>2</u> Emergency MOTION for Leave to Proceed in forma pauperis filed by Parviz N Naffis ( <i>Civil Coversheet</i> ) (Parker, Kim) (Entered: 07/23/2018)  |
| 07/23/2018 | <u>5</u> | AMENDED COMPLAINT against United States Department of Education, filed by Parviz N Naffis. (Attachments: # <u>1</u> Supplement Redline Amended Complaint)(Parker, Kim) (Entered: 07/23/2018)  |
| 07/23/2018 | <u>6</u> | MOTION for Preliminary Injunction by Parviz N Naffis (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Text of Proposed Order, # <u>3</u> Exhibit A, # <u>4</u> Exhibit B, # <u>5</u> Exhibit C, # <u>6</u> Exhibit D, # <u>7</u> Exhibit E, # <u>8</u> Exhibit F, # <u>9</u> Exhibit F1, # <u>10</u> Exhibit G, # <u>11</u> Exhibit H, # <u>12</u> Exhibit I, # <u>13</u> Exhibit J, # <u>14</u> Exhibit K, # <u>15</u> Exhibit L)(Parker, Kim) (Entered: 07/23/2018) |
| 07/24/2018 | <u>7</u> | NOTICE of Appearance by Sarah A Marquardt on behalf of All Defendants (Marquardt, Sarah) (Entered: 07/24/2018)  |

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| 07/24/2018 | <u>8</u>  | ORDER granting <u>2</u> Motion for Leave to Proceed in forma pauperis; directing the Clerk to issue summons. Signed by Judge George Jarrod Hazel on 7/24/2018. (jf3s, Deputy Clerk) (Entered: 07/24/2018)  |
| 07/25/2018 | <u>9</u>  | Summons Issued 60 days as to United States Department of Education, U.S. Attorney and U.S. Attorney General (Attachments: # <u>1</u> Summons, # <u>2</u> Summons)(jf3s, Deputy Clerk) (Entered: 07/25/2018)  |
| 08/08/2018 | <u>10</u> | SUMMONS Returned Executed by Parviz N Naffis. United States Department of Education served on 7/30/2018, answer due 9/28/2018. (Attachments: # <u>1</u> Exhibit)(Parker, Kim) Modified on 8/16/2018 (heps, Deputy Clerk). (Entered: 08/08/2018)  |
| 09/03/2018 | <u>11</u> | MOTION for Clerk's Entry of Default for want of answer or other defense by Parviz N Naffis(Parker, Kim) (Entered: 09/03/2018)  |
| 09/03/2018 | <u>12</u> | MOTION for Other Relief <i>Motion for an immediate injunction for Defendant's Failure to Respond or Otherwise Plead In Accordance With 5 U.S.C. § 552(a)(4)(C)</i> , MOTION for Preliminary Injunction by Parviz N Naffis (Attachments: # <u>1</u> Text of Proposed Order)(Parker, Kim) (Entered: 09/03/2018)                                |
| 09/04/2018 | <u>13</u> | RESPONSE in Opposition re <u>6</u> MOTION for Preliminary Injunction filed by United States Department of Education. (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Exhibit 2)(Marquardt, Sarah) (Entered: 09/04/2018)   |
| 09/04/2018 | <u>14</u> | MOTION for Extension of Time to File Response/Reply as to <u>6</u> MOTION for Preliminary Injunction by United States Department of Education. (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Text of Proposed Order)(Marquardt, Sarah) (Entered: 09/04/2018)  |
| 09/04/2018 | <u>15</u> | RESPONSE re <u>12</u> MOTION for Other Relief <i>Motion for an immediate injunction for Defendant's Failure to Respond or Otherwise Plead In Accordance With 5 U.S.C. § 552(a)(4)(C)</i> MOTION for Preliminary Injunction filed by United States Department of Education.(Marquardt, Sarah) (Entered: 09/04/2018)                           |
| 09/05/2018 | <u>16</u> | MOTION for Extension of Time to File Response/Reply as to <u>5</u> Amended Complaint by United States Department of Education. (Attachments: # <u>1</u> Exhibit 1, # <u>2</u> Exhibit 2, # <u>3</u> Text of Proposed Order)(Marquardt, Sarah) (Entered: 09/05/2018)  |
| 09/06/2018 | <u>17</u> | PAPERLESS ORDER granting NUNC PRO TUNC <u>14</u> Motion for Extension of Time to File Response/Reply ; granting <u>16</u> Motion for Extension of Time to File Response/Reply. Signed by Judge George Jarrod Hazel on 9/6/2018. (am2s, Chambers) (Entered: 09/06/2018)   |
| 09/26/2018 | <u>18</u> | RESPONSE re <u>11</u> MOTION for Clerk's Entry of Default for want of answer or other defense filed by United States Department of Education.(Marquardt, Sarah) (Entered: 09/26/2018)  |
| 10/04/2018 | <u>19</u> | MOTION for Extension of Time to File Response/Reply to <i>Plaintiff's Amended Complaint</i> by United States Department of Education.(Marquardt, Sarah) (Entered: 10/04/2018)  |
| 10/12/2018 | <u>20</u> | ORDER granting <u>19</u> Motion for Extension of Time to File Response/Reply. Signed by Judge George Jarrod Hazel on 10/12/2018. (Hazel, George) (Entered: 10/12/2018)   |
| 10/16/2018 | <u>21</u> | MOTION for Extension of Time to File Response/Reply to <i>Plaintiff's Amended Complaint</i> by United States Department of Education. (Attachments: # <u>1</u> Exhibit 1)(Marquardt, Sarah) (Entered: 10/16/2018)  |
| 10/23/2018 | <u>22</u> | MOTION to Dismiss for Failure to State a Claim <i>or, Alternatively, for Summary Judgment</i> by United States Department of Education (Attachments: # <u>1</u> Memorandum in Support, # <u>2</u> Exhibit 1, # <u>3</u> Exhibit 2, # <u>4</u> Exhibit 3, # <u>5</u> Exhibit 5, # <u>6</u> Exhibit 8)(Marquardt, Sarah) (Entered: 10/23/2018) |
| 10/24/2018 | <u>23</u> | NOTICE by United States Department of Education re <u>22</u> MOTION to Dismiss for Failure to State a Claim <i>or, Alternatively, for Summary Judgment</i> <i>LINE FILING EXHIBIT 4, EXHIBIT 7, CERTIFICATE OF SERVICE</i> (Attachments: # <u>1</u> Exhibit 4, # <u>2</u> Exhibit 7)(Marquardt, Sarah) (Entered: 10/24/2018)                 |

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| 11/07/2018 | <u>24</u> | MOTION for Extension of Time to File Response/Reply as to <u>22</u> MOTION to Dismiss for Failure to State a Claim <i>or, Alternatively, for Summary Judgment</i> , <u>23</u> Notice (Other), by Parviz N Naffis (Attachments: # <u>1</u> Text of Proposed Order)(Parker, Kim) (Entered: 11/07/2018)     |
| 11/09/2018 | <u>25</u> | ORDER Granting <u>24</u> Motion for Extension of Time to File Response/Reply as to <u>22</u> MOTION to Dismiss for Failure to State a Claim <i>or, Alternatively, for Summary Judgment</i> , . Signed by Judge George Jarrod Hazel on 11/9/2018. (heps, Deputy Clerk) (Entered: 11/09/2018)              |
| 11/26/2018 | <u>26</u> | Second MOTION for Extension of Time to File Response/Reply as to <u>22</u> MOTION to Dismiss for Failure to State a Claim <i>or, Alternatively, for Summary Judgment</i> , <u>25</u> Order on Motion for Extension of Time to File Response/Reply, by Parviz N Naffis(Parker, Kim) (Entered: 11/26/2018) |
| 12/03/2018 |           | PAPERLESS ORDER granting <u>26</u> Motion for Extension of Time to File Response/Reply. Signed by Judge George Jarrod Hazel on 12/3/2018. (jw2s, Deputy Clerk) (Entered: 12/03/2018)   |
| 12/07/2018 | <u>27</u> | MOTION for Voluntary Dismissal <u>22</u> MOTION to Dismiss for Failure to State a Claim <i>or, Alternatively, for Summary Judgment</i> , <u>5</u> Amended Complaint, <u>23</u> Notice (Other), by Parviz N Naffis (Attachments: # <u>1</u> Text of Proposed Order)(Parker, Kim) (Entered: 12/07/2018)    |